

(Counsel listed on signature page)

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

Case No. 5:17-cv-05671-BLF-NC

**STIPULATION OF DISMISSAL AND  
COVENANT NOT TO SUE**

Judge: Hon. Beth Labson Freeman

**STIPULATION OF DISMISSAL OF U.S. PATENT NO. 7,675,806 AND U.S.  
PATENT NO. 8,268,672**

Whereas, U.S. Patent No. 7,675,806 and U.S. Patent No. 8,268,672 are collectively the “Asserted ’806 and ’672 Patents” in the above-captioned Action;

Whereas, Plaintiff VLSI Technology LLC (“VLSI”) and Defendant Intel Corporation (“Intel”) (each a “Party,” and together, the “Parties”) seek to permanently resolve all disputes concerning Intel or Intel technology with respect to the Asserted ’806 and ’672 Patents; and

Whereas, the Parties have agreed to dismissal of claims and counterclaims asserted in this action on the basis described below;

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the Parties hereby jointly stipulate as follows:

That all counts of VLSI’s complaint regarding the Asserted ’806 and ’672 Patents, including amendments, are dismissed with prejudice;

That all counts of Intel’s counterclaims, including amendments, regarding the Asserted ’806 and ’672 Patents (but not counterclaims regarding any other patents) are dismissed without prejudice;

That all defenses to the Parties’ claims and counterclaims regarding the Asserted ’806 and ’672 Patents are dismissed without prejudice. Notwithstanding the foregoing sentence, for clarity, all defenses, including without limitation Intel’s license defense, that also pertain to other patents asserted in this Action are dismissed only with respect to the Asserted ’806 and ’672 Patents and are not dismissed with respect to the other asserted patents;

That VLSI has granted to Intel, its affiliates and their respective former, current and future suppliers and customers under the Asserted ’806 and ’672 Patents a certain covenant not to sue (the “Covenant Not To Sue”);

That neither party is paying any amount to the other party in connection with the matters addressed by this Stipulation;

That this stipulation is entered voluntarily, and neither the fact of the stipulation or the Covenant Not To Sue, nor anything contained herein or in the Covenant Not To Sue, constitutes, or shall be construed as, an explicit or implied admission or evidence relating to any issue associated with the Action;

That each Party will bear its own attorneys' fees and costs incurred in connection with the matters addressed by this Stipulation; and

That any disputes between the Parties regarding the Asserted '806 and '672 Patents, the Covenant Not To Sue or this Stipulation shall be litigated solely in the United States District Court for the Northern District of California.

That the Court orders the Asserted '806 and '672 Patents are dismissed from the Action on the terms described above.

SO STIPULATED AND AGREED.

Dated: January 12, 2024

IRELL & MANELLA LLP

By: /s/ Charlotte J. Wen  
Charlotte J. Wen

*Counsel for Plaintiff*  
VLSI TECHNOLOGY LLC

Dated: January 12, 2024

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*Counsel for Defendant*  
INTEL CORPORATION

**ATTESTATION**

I hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from counsel for Defendant.

Dated: January 12, 2024

/s/ Charlotte J. Wen

Charlotte J. Wen